

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

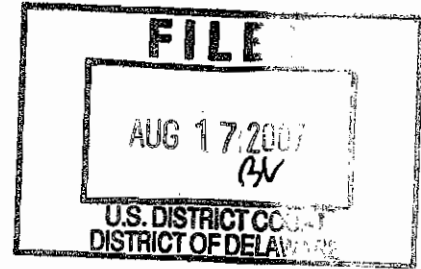
Cathy D. Brooks-McCollum  
& On behalf of  
Emerald Ridge Service Corporation Derivative Action  
As a Director  
PO Box 12166  
Wilmington, DE 19850  
(302) 521-1241  
**(PLAINTIFF)**

**CIVIL ACTION NO: 04-419 (JJF)**

**JURY TRIAL REQUESTED**

vs.

State Farm Insurance Company  
**(DEFENDANTS)**



**PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS**

Plaintiff, Cathy D. Brooks-McCollum, requests that Mrs. Maudy Melville a party, who State Farm paid services for, not covered under the Insurance Policy, admit or deny the following statements of law. If objection is made, please state the reason for the objection. Please specifically deny the matter or set forth in detail the reasons why the answering party cannot truthfully admit or deny the matter.

**REQUESTS FOR ADMISSION**

1. Admit that you were never a valid Stockholder of the Emerald Ridge Service Corporation.
2. Admit that you have no basis to assert as a defense or affirmative defense to the subject matter, lack of personal jurisdiction.
3. Admit that you took part in submitting the insurance claims to State Farm.
4. Admit that you were aware and agreed to all the submissions and filings made by Edward Kafader on your behalf.
5. Admit that you knew all Plaintiffs' case before all Courts were on behalf of Plaintiff Cathy Brooks-McCollum & Emerald Ridge Service Corporation & were Derivative in nature.
6. Admit that you and State Farm refused to pay the attorney hired to properly represent the Emerald Ride Service Corporation, at your request.
7. Admit that you knew some of the actions asserted by Mr. Kafader were illegal in nature.
8. Admit that you were told by Attorney Edward Kafader that his defense for the crimes he committed was protected by immunity and that he did inform you that you were not afforded the same immunity.
9. Admit State Farm was aware and agreed with you and gave you the authority to make the assertions made before the Emerald Ridge Service Corporation informing said Corporation that you were representing their interest through Edward Kafader and not merely your own.

10. Admit that you agreed to pay Attorney Jon Parshall's from the Corporation's funds.

11. Admit that Jon Parshall's was paid for services from the State Farm Insurance Policy.

12. Admit that Attorney Jon Parshall was working through (Edward Kafader) and you were allowing him to make all decisions and gave your consent for him to do so.

13. Admit that State Farm gave you free will to claim all the assertions made before the Emerald Ridge Corporation and the all courts.

14. Admit that you advised State Farm of all your actions made before the courts with their approval.

15. Admit that you knew that the law did not allow you Edward Kafader to represent the interest of the Corporation, yourself, knowing that the Corporation was also personally suing you in all as part of the Derivative lawsuit, where an attorney was retained on behalf of the Corporation in the US Courts and you still went before the Corporation stating something contrary.

16. Admit that State Farm through Edward Kafader advised you to submit and give false information in all cases as a means not to pay out valid claims to a valid Officer of the Emerald Ridge Service Corporation, as a means to allow you to steal from the Corporation, and as a means to cause an undue hardship and burden upon Plaintiffs.

17. Admit that you had first hand knowledge that it has and is a practice of State Farm Insurance and their offices to deny claims and commit such actions in order not to pay out valid claims

18. Admit that you had first hand knowledge that State Farm has been accused and convicted for having used strong arm tactics thorough their attorneys in an attempt to wear them down valid insurance claims.

19. Admit that State Farm through its' attorneys (including you) played a valid part in forcing Plaintiff and her family from their homes by any means necessary, just so that you all could avoid adhering to the law.

20. Admit that State Farm authorized and is aware of the video tapes made of you going before the Emerald Ridge Service Corporation giving false information, although knowing that your actions were and are against the Rules of Professional Conduct, and agreed to you implicating them on said video.

21. Admit that you advised Attorney Donald Gouge not to supply Plaintiff with discovery as a means to circumvent Plaintiff due process, and it was not a sole decision of him alone.

22. Admit that you have first hand knowledge of the threats made against Plaintiff and her family and the damage to Plaintiffs personal property as a result of your illegal activities, and desire to take over the board under any means necessary.

23. Admit that based on the terms of the Emerald Ridge Insurance Policy State Farm and you knew that State Farm was insuring the incorrect person, and had know regard for the welfare of the Plaintiff Emerald Ridge Corporation in this case and the cases in which State Farm hired and paid Edward Kafader against the State Farm Policy to represent you (arguing that Edward Kafader was representing State Farm, The Corporation, and the persons being sued by the Corporation).

24. Admit that you advised Donald Gouge not to turn over all the Emerald Ridge Bank Records and documents per discovery, and it was not a decision of him alone to ignore the Subpoena served regarding discovery.

25. Admit that even after the US Court Of Appeals confirmed through its' opinion that it saw where you (State Farms Attorney Edward Kafader) did violate the Rules of Professional Conduct and did commit crimes against Plaintiff, you maintained the position that it Plaintiffs will not be paid one penny for the crimes committed by the persons hired by State Farm as **BULLY's**, nor the attorney hired to protect the Corporations interest.

26. Admit that you understand that you can't claim immunity as did Edward Kafader.

27. Admit that Defendant State Farm and/or Edward Kafader instructed and hired you to carry out the mock and illegal elections before the Plaintiffs Emerald Ridge Service Corporation, as a means to cover up the prior crimes committed by Defendant State Farm.

28. Admit that when the illegal election took place and was not successful that Attorney (Edward Kafader) informed State Farm at every stage of his intentions to go before the Corporation and give false information as a means to keep you (of who State Farm funded) in charge of the Corporation books, bank records and Insurance policy and notes, as a means to continue to deceive the Corporation, regardless of the harm it caused the Corporation and Stockholders. Plaintiffs also request these documents to be turned over once again.

29. Admit that you have caused all Plaintiffs substantial financial hardship as a result of your trying to cover up an error made by you and State Farm, thus making this error into a criminal act.

30. Admit that you agreed to pay legal costs for Kenneth Shareef, although informed that he was never a stockholder, or valid officer.

31. Admit that you had first hand knowledge that Kenneth Shareef was never a valid Office of the Corporation, and you tried to cover this up at first, and then conceded.

32. Admit that you knew that Kenneth Shareef an invalid Officer then made invalid appointments to the Emerald Ridge Service Corporation, and then resigned himself, as a means to cut his losses.

33. Admit that you knew that Kenneth Shareef an invalid Officer appointed Maudy Melville and Renford Brevett to the Board, although neither of them were validly elected to hold office, and that you admitted this via court records.

34. Admit that you knew that Maudy Melville and Renford Brevett then appointed others to the Emerald Ridge Service Corporation Board, under the Direction of yourself (Edward Kafader) as a means to cover up the illegal activity funded by State Farm, filed and confirmed through court filings made by you.

35. Admit that State Farm was aware that neither Kenneth Shareef, Maudy Melville, and/or Renford Brevett had authority to alter or change bank records, until at such time the courts acknowledged validly elected officers, and that you who were hired by State Farm, gave the instructions to do this.

36. Admit that you agreed to all actions after the Delaware State Courts and US courts confirmed and admitted through legal documents filed with the court that it did violate the law, and their only defense was that they were immune from prosecution, Defendant State Farm still refused to adhere to the laws, and advised its' Attorney Edward Kafader to claim immunity from prosecution as well, who continued his actions.

37. Admit that Defendant State Farm has and continue to refuse to meet its obligation pursuant Delaware Law, State Farms Policy, Plaintiff Emerald Ridge Service Corporation, Bylaws, Certificate Of Incorporation at the advise of you.

38. Admit that even when Defendant State Farm was informed via its' Attorney Edward Kafader & Plaintiff that the Corporation's Attorney Donald Gouge confirmed and admitted that none of the parties on the board were illegal, State Farm authorized, and continued to fund your costs, and sent Attorney Edward Kafader before the Corporation stating what was contrary to the Corporation's Counsel written statement.



39. Admit that State Farm through Attorney Edward Kafader paid off Attorney Donald Gouge to commit crimes against all things he confirmed and agreed were illegal, as a means to cover up their actions, and protect State Farm, and extort funds from Emerald Ridge Corporation for payment of giving ill advice.

40. Admit that you informed Donald Gouge that if he did not go along with your scheme that he would not be paid from the Corporations funds for any services.

41. Admit as noted in court records filed by Attorney Kafader, that he and State Farm advised you to go before the Corporation and have your actions Ratified and Certified and/or if it were solely a decision made by you alone.

42. Admit that you were informed the risk you face, for the crimes committed and still continued the route in which you chose.

43. Admit that the Corporation was informed via video that *"a win for State Farm and his clients was a win for them"* and that you agreed to and or went along with this.

44. Admit that you agreed to the false terms and invalid Settlement Agreement presented before Plaintiff by Attorney Edward Kafader on your behalf, and had input in said settlement negotiations.

45. Admit to what funds Jon Parshalls' was being paid from.

46. Admit that you received independent counsel advice aside from the Attorney hired by State Farm in protecting your interest, and you agree not to be afforded to argue ineffective counsel.

47. Admit that you agreed and confirm that you authorized Attorney Edward Kafader and Attorney Jon Parshalls' to represent your interest as a group, instead of seeking individual counsel.

48. Admit that you have agreed with all the decisions and advice given by Attorney Edward Kafader.

49. Admit that you have agreed with all the decisions and advice given by Attorney Jon Parshalls.

50. Admit that you were made aware that should you be determined not to be indemnified and invalid you will have to reimburse all the costs paid to you back to State Farm Insurance Company, and admit if advised differently and by whom.

51. Admit that you were made aware that should you be determined not to be indemnified you will have to pay all the costs paid to Attorney Donald Gouge & Jon Parshalls' on your behalf, and admit if advised differently and by whom.

52. Admit that you were made aware that your home could be forced to be sold and/or garnishment to pay any costs you cannot pay surrounding these proceedings, and admit if advised differently and by whom.

53. Admit that you were made aware that any award made to Plaintiffs Cathy Brooks-McCollum and Emerald Ridge Service Corporation will have to be paid by you and all other parties not determined to be valid (of which was already admitted in court records), and not to be indemnified and admit if advised differently and by whom.

54. Admit that you agreed and agree to knowing that any and all costs will have to be paid by you for any jury and/or court awarded costs and admit if advised differently and by whom.

55. Admit that you are aware that Attorney Edward Kafader's first and only interest is that of State Farm over yours, and admit if advised differently and by whom.

56. Admit that you were made aware that State Farm has in the past been sued for having their attorney's ill advise clients, and then turn around and make the clients pay for the costs incurred as a result of Attorney's paid by them for them, whose only recourse after was to sue State Farm.

57. The Plaintiff did sustain injuries as a result of the crimes committed by you.

58. The Plaintiff did have to remove her family from dangerous circumstances as a result of you.

59. The Plaintiff and her family incurred in excess of an additional \$500,000 worth of expenses and damages as a result of your actions.

60. The Plaintiff has been forced to defend herself and other Plaintiff (Emerald Ridge Service Corporation), as a means not to have her Constitutional Rights violated.

61. The Plaintiff and her family have been forced to conceal their living arrangements as a result of these parties crimes committed, as a means of protection.

62. State Farm issued a Policy to protect the Corporation and valid Officers of the Corporation in this case.

63. State Farm did not adhere to the terms of your own policy.

64. State Farm maintained insurance that covers your liability in this lawsuit.

65. State Farm maintained insurance that covers Plaintiff Cathy Brooks-McCollum's liability in this lawsuit.

66. State Farm maintained insurance that covers Plaintiff Emerald Ridge Service Corporation's liability in this lawsuit.

67. You have in your possession and have refused pursuant discovery to supply Plaintiff with all Insurance Policies underwritten concerning Plaintiff Emerald Ridge Service Corporation. **Plaintiff requests these to be turned over.**

68. You have in your possession and have refused pursuant discovery to supply all documents submitted to you for coverage under the Emerald Ridge Service Corporation Policy and the persons who submitted and signed any and all claims.

69. You have in your possession and have refused pursuant discovery to supply all documents submitted to you for coverage under the Emerald Ridge Service Corporation Policy.

70. The injury to Plaintiff's is such that it has affected her emotional well being, as well as the financial well being, and that of the Plaintiff Emerald Ridge Service Corporation.

71. The video tape of Attorney Kafader and Donald Gouge giving false information before the Corporation is authentic.

72. The Affidavits to the invalid elections, and false statements made before the Corporation are authentic.

73. The witnesses to be presented have first hand knowledge of this case.

74. The move made by Plaintiff's was necessary for protection.

75. The costs incurred and losses incurred substantiating said loss was unforeseeable as a result of the current housing market.

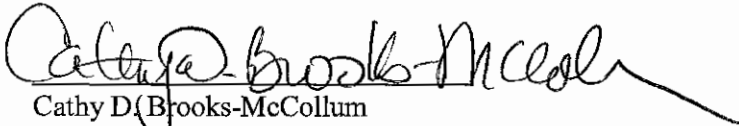
76. The legal costs incurred by Plaintiff Cathy Brooks-McCollum and on behalf of Plaintiff Emerald Ridge Service Corporation were reasonable.

77. Plaintiff continue to have to work, due to having to liquidate assets to cover legal costs, and increase costs in housing, where Plaintiff have now incurred additional losses, due to the recent house sale downslide.

78. Plaintiff continue to incur a burden of having to remove her children from a private Christian School, to public school as a result of the crimes committed by you, and Plaintiff having to abruptly move.

79. Plaintiff also request that any changes in employment by State Farms Staff with knowledge of this case be turned over, as well as Kenneth Shareef's new address, a party State Farm has listed as a witness, and who has sense moved, with no new address to be served upon supplied, and a party State Farm considers a key witness.

Submitted,

A handwritten signature in black ink, appearing to read "Cathy D. Brooks-McCollum", with a long horizontal flourish extending to the right.

Cathy D. Brooks-McCollum  
PO Box 12166  
Wilmington, DE 19850  
August 9, 2007

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FOR THE DISTRICT OF DELAWARE**

Cathy D. Brooks-McCollum  
& On behalf of  
Emerald Ridge Service Corporation Derivative Action  
PO Box 12166  
Wilmington, DE 19850  
(302) 521-1241

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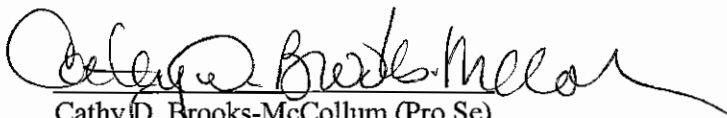
vs.

State Farm Insurance Company  
**(DEFENDANTS)**

**PROOF OF SERVICE**

I Cathy D. Brooks-McCollum hereby certify that on the 9th day of August 2007, I will and have caused to be served a true and correct copy of the foregoing Request For Admissions on:

Valerie Longhurst  
11 Winchester Court  
Bear, DE 19701  
(302) 836-3717



Cathy D. Brooks-McCollum (Pro Se)  
PO Box 12166  
Wilmington, DE 19850  
(302) 521-1241